

1 Jorge Alejandro Rojas
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3 Plaintiff in Pro Se
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
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11 JORGE ALEJANDRO ROJAS,
12 Plaintiff,
13 v.
14 UNPLUGGED MEDIA, LLC, et al,
15 Defendants.
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Case No. 2:23-cv-02667-SPG-KS

**DECLARATION OF JORGE
ALEJANDRO ROJAS IN SUPPORT
OF REQUEST FOR ELECTRONIC
APPEARANCE VIA ZOOM**

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19 I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

- 20 1. I am the Plaintiff in this case, and make the following statements based on my
21 personal knowledge and records. If called to testify concerning any of these
22 statements, I will be able to do so.
- 23 2. I make the statements in this declaration in support of Plaintiff's Request for
24 Electronic Appearance via Zoom.
- 25 3. I e-mailed Defendant Alexander Bykhovsky concerning whether he would consent
26 or not consent to my request for electronic appearance on March 22, 2024, and he
27 stated in response on the same day "I'm not in the country, I don't consent to the
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1 Court's jurisdiction over me.” I emailed him thereafter to ask for a time to confer
2 prior to making the instant request and he has not responded.

3 4. I am employed as a Systems Engineer, for a government contractor, and reside and
4 work in a suburb of Chicago, Illinois.

5 5. My work schedule primarily consists of Monday through Friday, nine hours of work
6 per day.

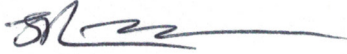
7 6. My current schedule for the week of the hearing would necessitate that I miss at least
8 one, and possibly two days of work to attend the hearing in person, as I would travel
9 from Chicago, Illinois. If I were to attend the hearing virtually the period which I
10 miss would be shorter as I would not need to travel as well as be more economical
11 because I would not need to purchase air fare. I would also need to arrange for
12 someone to take over any customer meetings or commitments that I have for my
13 position. I am also scheduled to travel on April 19, 2024 and while this is not the
14 same date as the hearing being able to attend the hearing virtually would mitigate
15 further compression of Plaintiff's schedule.

16 7. When communicating with Defendant Bykhovsky concerning the entry of default
17 against his company, Unplugged Media, LLC, he stated in response “I am in
18 Panama. It is logistically impossible for me to address this until/unless I move back
19 to the United States.”

20 8. I believe that attending the hearing virtually via Zoom would allow me, and possibly
21 Mr. Bykhovsky if he chooses to attend, the ability to answer any questions or
22 concerns the Court has at oral argument concerning the pending motions. I am
23 unaware of Mr. Bykhovsky intending to attend.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct. Executed on March 31, 2024, in Bolingbrook, IL.

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